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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY  
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Mr. Philip H. Mook, Jr.  
Western Execution Branch Chief  
Air Force Civil Engineer Center  
United States Department of the Air Force

SUBJECT: 11/17/2016 Letter re: Former Williams AFB Site ST012, Liquid Fuels Storage Area  
Path Forward; 11/30/2016 Letter from TerraTherm

Dear Mr. Mook:

Thank you for your letter inquiring about the path forward for the ST012 Site "Site". We acknowledge and appreciate the AF's ongoing efforts to contain and characterize the extent of remaining LNAPL contamination and agree that progress is being made. We look forward to the startup of the new hydraulic containment system in January. Based upon our review of the data being collected, maintaining hydraulic containment will be critical to the future protectiveness of the remedy going forward.

We also received a copy of the November 30, 2016 letter from John Biershank of TerraTherm requesting access to the Site to remove their remaining Steam Enhanced Extraction (SEE) system equipment; *"given the SEE system has been essentially dismantled, AMEC and the Air Force could not restart SEE activities without reconstructing the SEE system and essentially beginning the mobilization process all over again."* In furtherance of continued progress, EPA and ADEQ are in agreement with TerraTherm's request to allow them to remove their equipment from the site.

At this time the path forward for ST12 is complicated by many factors and uncertainties that must be resolved before we can understand and reach agreement upon the most appropriate next steps. The data AF is collecting now will help delineate the lateral extent of contamination as it currently exists, and sentry wells are being installed to enable us to evaluate the success of the hydraulic containment. In our comments on the Field Variance for characterization, we also requested additional wells or borings to be located closer to the known contaminated area to reduce the uncertainty in the extent and mobility of contamination. These are still needed to reduce uncertainty in the estimate of remaining LNAPL mass, but have not yet been added to the field variance for characterization.

As the 2013 Record of Decision Amendment (RODA) specified attainment of remedial action objectives within 20 years, we now need to understand how expectations for the longevity of this remedy have changed given the current site conditions. We also need to understand the feasibility and cost/benefit of the options going forward. At the time of the RODA signature, it was not anticipated that there would be large quantities of remaining LNAPL, especially untreated mobile LNAPL still rich in benzene and BTEX compounds, at the Site following termination of SEE. The fact that a large quantity of LNAPL remains at the site requires a re-assessment of our remedial progress and a critical evaluation of the path forward.

When the ST12 remedy was first described to the agencies, it was assumed that SEE would be employed to remove almost all of the LNAPL source in order to create optimal conditions for Enhanced Bioremediation (EBR) to degrade dissolved phase residual contaminants. Given that the construction costs associated with thermal technologies significantly outweigh the operational costs, thermal remedies are almost always run until the contaminant source is completely removed, as the industry standard for this technology. If essentially all of the LNAPL source material had been removed by SEE, there would have been no need for further hydraulic containment following SEE, hence, it was not included in the RODA. This understanding is documented in the January 4, 2013 draft proposed plan (attached) which described the remedy as follows: *"After most of the LNAPL is removed by SEE, the remedial action would transition to enhanced bioremediation"* This language was changed in subsequent documents to specify performance criteria for the SEE system which the agencies believed were intended to signal when most of the LNAPL had been removed. However, as we have previously explained, the performance criteria specified in the Remedial Design/Remedial Action Work Plan (RD/RAWP) had not been consistently attained at the time the SEE system was terminated and dismantled over regulatory agency objections.

The remaining mass estimates in the RD/RAWP Addendum 2 for EBR indicate that the SEE may have only targeted half of the LNAPL in the subsurface, and in addition to this, LNAPL remains in the thermal treatment area due to premature remedy termination. This creates significant uncertainty for the proposed EBR application. An accurate estimate of remaining LNAPL mass and BTEX concentrations residing within the LNAPL mass within specific locations and depths is critical to 1) resolve uncertainties of amendment mass loading required for successful implementation of EBR, 2) enable specific areas and depth zones to be targeted for treatment 3) evaluate the impact of amendment upon groundwater quality, 4) estimate the anticipated timeframe to meet remedial action objectives, and 5) define milestones for monitoring EBR remedy success against baseline conditions. Appropriate and agreed-upon baseline conditions would need to be established in order to be able to monitor remedy performance. AF's responses to agency comments provided to date have not provided this information and have not resolved these concerns.

Your letter of November 17, 2016 expresses concerns that elevated post steam temperatures are necessary for successful EBR implementation as *"partially dependent upon taking advantage of the increased solubility and dissolution of contaminants of concern (COCs) from LNAPL occurring at elevated temperatures"*, and, *"increased anaerobic degradation at the higher temperatures is currently establishing microbial populations that can be further enhanced for bioremediation of COCs. If extended extraction is used for hydraulic containment instead of*

**Commented [dCK1]:** Understand all the comments about EBR not being appropriate for LNAPL source zones. It is too bad we did not incorporate that language at the time of the RODA. We assumed as this is generally recognized in industry that we wouldn't need to say it. According to the RODA EBR is part of the remedy. We also have an RD/RAWP that incorporates EBR treatment of LNAPL areas that we did not go to dispute on. So we have to be careful how we phrase this. EBR may still be appropriate for areas on the fringes and especially under buildings once the bulk of the source material is removed. Our position is that existing conditions are not conducive to successful EBR at this time, and we need to educate AF to see that. Our position is that the current proposal "is too big to fail"

establishing EBR reagent distribution, deterioration of conditions favorable to the anaerobic EBR approach will occur due to introducing cooler groundwater and higher dissolved oxygen levels." While elevated temperatures may enhance bacterial growth, this is generally true for only a narrow range of temperatures. Temperatures significantly above this narrow range are not favorable for microbial survival. In addition, the rate of mass loading of sulfate amendment can also affect the degradation rate and would need to be carefully monitored and controlled. We did not see acknowledgement or preparations to address these considerations in the RD/RAWP Addendum 2. (Please see attached journal article, *Engineered Anaerobic Bio-Oxidation Systems for Petroleum Hydrocarbon Residual Source Zones with Soluble Sulfate Application* Suthersan et al., *Ground Water Monitoring & Remediation*, 31(3):41-46, 2011)

Commented [dCK2]: Dan and Eleanor are in agreement with this?

Recently, during the 5 Year Review inspections for the Lawrence Livermore site where a smaller 100,000 cubic yard thermal application was implemented it was documented that subsurface temperatures within the former treatment area still remain elevated by a few degrees above the surrounding aquifer twenty years after termination of thermal treatment. In comparison, the 410,000 cubic yard SEE application at ST12 is the largest and deepest ever implemented and can be expected to remain at elevated temperatures for many years, even with ongoing extraction for containment. The same conditions that enhance solubility and dissolution of contaminants conducive to EBR also increase the mobility of contaminants; which are the most significant concern the regulatory agencies have for maintaining the future protectiveness of the remedy. Contaminants cannot be allowed to migrate away from the site and create a more extensive groundwater plume.

Based upon our analysis of the most recent soil boring and groundwater data, migration of the dissolved phase already appears to be occurring. For example, the data from the existing sentry wells provided on November 30, 2016 indicated increasing benzene concentrations at W-36 which doubled between 8/31 and 11/1, and is now 1600 ug/l. We also note the November 11, 2016 weekly report several interior Thermal Treatment Zone wells in the Lower Saturated Zone (LSZ) which previously were shown to be free of LNAPL following SEE treatment now have over a foot of LNAPL in them. **LNAPL has already been removed from several steam injection wells in both the UWBZ and LSZ in the post SEE monitoring phase. LNAPL appearance in monitoring wells has diminished because the driving pressure gradient to move the LNAPL into wells (i.e., drawdown) has diminished following termination of extraction, not because LNAPL has been depleted from the subsurface.** These observations indicate that LNAPL within the treatment area was not recovered and could migrate off site if not contained. Numerous recent characterization borings, including CZ-23, UWBZ-37, LSZ-43, LSZ-45, LSZ-46, UWBZ28/LSZ51, UWBZ33/LSZ48, SB19/LSZ61, LSZ44, had PID readings or analytical results indicative of contamination exceeding the MCL for benzene, and it is not clear that the containment system currently being constructed will be adequate contain the plume in these areas. Once the containment system is operating, an assessment of the capture zone should be undertaken, and necessary improvements to the system must be made.

Commented [dCK3]: These two sentences appear contradictory and will likely be confusing to the management team. Probably one or the other of these sentences should be deleted

The EBR application as described in the Addendum 2 RD/RAWP is a much larger effort than was anticipated at the time of the 2013 RODA signature. The large amount of amendment proposed to be injected to degrade the remaining LNAPL cannot be permitted to degrade water quality downgradient of the site and must therefore also be contained. It does not appear that the

interim containment system now being constructed has been designed to be capable of also treating extracted EBR amendment or the arsenic contaminant it contains; the treatment system will require an upgrade to treat the extracted amendment before EBR application could begin. If AF is concerned that cooler water from outside of the Site should not enter the EBR treatment area, the containment system should be reconfigured to extract from perimeter wells to meet that objective. The costs of long term containment should also be weighed against performing additional SEE to eliminate the bulk of LNAPL as was intended under the current remedy specified in the 2013 RODA.

The efficacy of EBR to treat such a large mass of remaining LNAPL is questionable and unprecedented in that this has never been attempted anywhere else on a comparable scale, and has not even been bench or pilot tested at this site. LNAPL cannot be expected to directly biodegrade; the LNAPL components must first dissolve into the aqueous phase for degradation to occur. The modelling effort employed in the RD/RAWP Addendum 2 does not account for mass transfer limitations of dissolution. The attached paper, *Engineered Anaerobic Bio-Oxidation Systems for Petroleum Hydrocarbon Residual Source Zones with Soluble Sulfate Application Suthersan et al., Ground Water Monitoring & Remediation, 31(1):45-49, 2011* states “The presence of a NAPL source zone leads to inherent uncertainty with regard to achieving remediation endpoints as the NAPL extent and structure (i.e., surface area) is unknown.” Furthermore, “The presence of a smear zone, where porosity is consumed to varying extents by residual separate-phase PHCs, can present a challenge to effective reagent delivery.” Currently, the smear zone at ST12 extends nearly 100 feet from the water table to 230 feet below ground surface and it cannot be expected that it can be treated adequately by amendment injection.

It has also come to our attention that AF’s Preliminary Assessment for Perfluorinated Compounds (PFCs PA) identified the area of ST12 as the site of at least 2 spills where PFC firefighting foams were applied and allowed to soak into the ground. Although we currently have no data to assess the situation, a follow on Site Inspection has been recommended. EPA deferred remedy protectiveness for ST12 on the 2016 Five Year Review pending resolution of data gaps for PFCs. This uncertainty also contributes to the difficulty in determining the most appropriate path forward for ST12 at this time, as the ultimate remedy needs to be compatible with and address all of the potential concerns at the site. For example, it was recently reported that perfluoroalkyl fatty acids (PFFA) precursors as found in firefighting foams may biotransform under aerobic conditions but not under anaerobic conditions such as currently proposed for the Site. (AECOM /Arcadis NEWMOA webinar presentation November 11, 2016.)

We hope that AF appreciates the technical complexity of the problem now to be solved. Given the substantial technical considerations, uncertainties, implementability, remedy effectiveness and cost/benefit considerations, we believe a focused RI/FS is warranted to resolve these issues if the AF chooses not to employ additional SEE to remove the remainder of LNAPL at the site. In the interim we also recommend aggressive extraction to remove as much mobilized LNAPL as possible and prevent the spread of groundwater contamination at the site.

Sincerely,

**Commented [DE4]:** This again makes it sound like we might agree to EBR of LNAPL.

**Commented [dCK5R4]:** Same response as above. Because we didn’t dispute the original RDRAWP we have essentially accepted that we will agree to consider EBR of LNAPL at it but the conditions and circumstances must be defined and must be practical.

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